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1                   UNITED STATES DISTRICT COURT  
2                   EASTERN DISTRICT OF PENNSYLVANIA  
3                   CASE NO.: 05-cv-4557  
4                   - - -

5                   DARRYL MURRAY, :  
6                   Plaintiff,     :  
7                   VS             :  
8                   ALLEN WEINSTEIN, :  
9                   Archivist of the     :  
10                  United States,     :  
11                  Defendants.  
12                  - - -

13                 Tuesday, November 14, 2006  
14                 Philadelphia, Pennsylvania  
15                 - - -

16                 Oral Deposition of IRENE JONES taken  
17                 pursuant to Notice, at the VA MEDICAL CENTER,  
18                 University and Woodland Avenues, Philadelphia,  
19                 Pennsylvania commencing at approximately 2:06  
20                 p.m., on the above date, before Tracey L. Pinsky,  
21                 CSR, RPR and Notary Public.  
22                 - - -

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27                 Philadelphia, PA 19103     (856) 235-5108  
28                 (215) 928-9760  
29                 - - -



IRENE JONES

1	APPEARANCES:	Page 2	IRENE JONES, after having been first
2	GERALD B. SULLIVAN, ESQUIRE		duly sworn, was examined and testified as follows:
3	U.S. Department of Justice		EXAMINATION
4	U.S. Attorney's Office		BY MR. SULLIVAN:
5	Eastern District of Pennsylvania		Q. Ms. Jones, good morning.
6	615 Chestnut Street		A. Good morning.
7	Suite 1250		Q. My name is Jerry Sullivan; I'm the
8	Philadelphia, Pennsylvania 19106		assistant United States attorney. I represent the
9	Counsel for the Defendants		National Archives and Records Administration in
10			this lawsuit that's been brought by Mr. Murray,
11			who I understand is your former coworker. Do you
12			understand that your testimony today is under
13			oath?
14			A. Uh-huh.
15			Q. And that means that you're required
16			not just to tell the truth, but to tell the
17			complete truth so that we have a full picture of
18			what happened during the event that we will be
19			talking about today. Do you understand that?
20			A. Yes.
21			Q. Okay. Because your testimony is
22			being taken down by a court reporter, it's really
23			important that all of your responses be oral in
24			words and not nods of the head or shrugs of the
1	INDEX	Page 3	Page 5
2	WITNESS	PAGE	shoulder. So if you could make sure that you do
3	IRENE JONES		make oral responses to all of my questions, that
4	By Mr. Sullivan	4	would be much appreciated. Do you understand
5			that?
6			A. Yes.
7	EXHIBITS		Q. Okay. Have you ever been deposed
8	NUMBER DESCRIPTION	PAGE	before?
9	A Statement	7	A. Yes.
10			Q. Okay. How many times?
11			A. Once.
12			Q. In what kind of action was that?
13			A. It's a family matter.
14			Q. Okay. So you understand a little
15			bit about how depositions proceed?
16			A. Yes.
17			Q. I'll still go through a few more
18			instructions, preliminary instructions so that you
19			understand the protocol.
20			A. Uh-huh.
21			Q. If you don't understand one of my
22			questions, please just let me know and I'll try to
23			rephrase it in a way that's understandable to you.
24			If you understand -- if you answer the question,
			I'm going to assume that you understood my

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IRENE JONES

<p>1 question. Okay?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. If you don't remember the</p> <p>4 answer to a question, you can say I don't</p> <p>5 remember. If you don't know the answer to a</p> <p>6 question, you could say I don't know. Okay?</p> <p>7 A. Okay.</p> <p>8 Q. If you need to take a break at any</p> <p>9 point, just let me know.</p> <p>10 A. Okay.</p> <p>11 Q. I'm going to ask if you do take a</p> <p>12 break, though, that you not discuss any of the</p> <p>13 deposition with Mr. Murray. Okay?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Are you on any medications today</p> <p>16 that might impair your ability to answer any of my</p> <p>17 questions?</p> <p>18 A. No.</p> <p>19 Q. Okay. Now, my subpoena directs you</p> <p>20 to bring any and all documents relating in any way</p> <p>21 to Darryl Murray and/or relating to persons whom</p> <p>22 you believe have been treated similarly or</p> <p>23 dissimilarly to Mr. Murray, and that are in your</p> <p>24 possession, custody or control. Did you bring any</p>	<p>Page 6</p> <p>1 MR. MURRAY: 2004.</p> <p>2 MR. SULLIVAN: Wait. Mr. Murray</p> <p>3 understand you are pro se, but --</p> <p>4 THE WITNESS: 2004.</p> <p>5 MR. SULLIVAN: -- you're not</p> <p>6 supposed to testify or speak. You can make</p> <p>7 objections if you think something is</p> <p>8 objectionable, but you're not supposed to speak</p> <p>9 during the deposition, otherwise. Okay?</p> <p>10 THE WITNESS: This was his last day</p> <p>11 of work.</p> <p>12 BY MR. SULLIVAN:</p> <p>13 Q. Okay. You haven't spoken to him</p> <p>14 since then?</p> <p>15 A. No.</p> <p>16 Q. Okay. Where are you currently</p> <p>17 employed?</p> <p>18 A. VA Medical Center.</p> <p>19 Q. Okay. And what do you do</p> <p>20 what -- but let me just say for the record that we</p> <p>21 are at the VA Medical Center in the regional</p> <p>22 counsel's room today.</p> <p>23 A. Uh-huh.</p> <p>24 Q. What do you do at the VA Medical</p>
<p>1 documents responsive to the subpoena?</p> <p>2 A. Just my statement.</p> <p>3 Q. Okay.</p> <p>4 A. It was the statement I had made at</p> <p>5 the time.</p> <p>6 Q. Okay. And you've just handed me a</p> <p>7 statement that's titled Affidavit of Irene Jones</p> <p>8 and dated January 27, 2005; is that correct?</p> <p>9 A. Uh-huh.</p> <p>10 Q. I'll have this marked as Exhibit A.</p> <p>11 (Exhibit A marked for</p> <p>12 identification.)</p> <p>13 BY MR. SULLIVAN:</p> <p>14 Q. Do you have any other documents</p> <p>15 anywhere in your possession, do you know of any</p> <p>16 the existence of any other documents that would be</p> <p>17 responsive to my subpoena?</p> <p>18 A. No, I don't.</p> <p>19 Q. Okay. I'll come back to the</p> <p>20 affidavit soon. When did you last speak to</p> <p>21 Mr. Murray before coming here today?</p> <p>22 A. January, same date as on -- last day</p> <p>23 at work. I mean, man, that was back in 2005, how</p> <p>24 long have you been gone there?</p>	<p>Page 7</p> <p>1 Center?</p> <p>2 A. Supervisor file clerk.</p> <p>3 Q. Okay. And what's your GS level?</p> <p>4 A. Seven.</p> <p>5 Q. How long have you been working at</p> <p>6 the VA Medical Center?</p> <p>7 A. A month.</p> <p>8 Q. Where were you last employed?</p> <p>9 A. Federal Records Center, Midatlantic</p> <p>10 Region.</p> <p>11 Q. For the National Archives and</p> <p>12 Records Administration?</p> <p>13 A. Yes.</p> <p>14 Q. And what did you do there in your</p> <p>15 last position?</p> <p>16 A. Archives technicians slash quality</p> <p>17 control.</p> <p>18 Q. Okay. And were you a GS-6?</p> <p>19 A. Yes.</p> <p>20 Q. Were you in the customer service</p> <p>21 division?</p> <p>22 A. Yes.</p> <p>23 Q. How long did you hold that position?</p> <p>24 A. Almost 18 years.</p>

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IRENE JONES

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<p>1 Q. Did you work in the same division as 2 Darryl Murray?</p> <p>3 A. No. Well -- no. While I was in the 4 customer service, he was in a different area. But 5 they was basically located in the same place.</p> <p>6 Q. Is that -- and now the records 7 center currently is on Townsend Road in 8 Philadelphia, correct?</p> <p>9 A. Yes.</p> <p>10 Q. When you say they were in the same 11 area we're in, that being the same area when you 12 were at Townsend Road?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Did you previously work at a 15 National Archives Record Center at -- on 16 Wissahickon Avenue in Philadelphia?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Were you and Mr. Murray in 19 the same part of that building as well?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. How long did you hold the 22 position of archives technician quality control?</p> <p>23 A. Three years.</p> <p>24 Q. Okay. And what did you do before</p>	<p>1 you saw Mr. Murray before today's deposition. Do 2 you remember the date?</p> <p>3 A. It's like November the 11th, 2004, 4 around -- somewhere around there.</p> <p>5 Q. But is this a date in which 6 Mr. Murray came to the records facility while he 7 was on administrative leave?</p> <p>8 A. Yes, I think so.</p> <p>9 Q. Okay. I'm just going to state for 10 the record it was September 22nd, 2004.</p> <p>11 A. Okay.</p> <p>12 Q. What did -- when did you come to 13 work that day?</p> <p>14 A. I was there six o'clock.</p> <p>15 Q. In the morning?</p> <p>16 A. Uh-huh.</p> <p>17 Q. And what was your schedule that day, 18 when was your lunch break scheduled for?</p> <p>19 A. My lunch break was 11:15.</p> <p>20 Q. Okay. And what had you been doing 21 in the morning?</p> <p>22 A. Working.</p> <p>23 Q. Okay. Before you left for your 24 lunch break, did you have any conversations with</p>
Page 11	Page 13
<p>1 that?</p> <p>2 A. Well, I actually -- quality control 3 was the 5-6 I went for, but I was the archive 4 technician before then.</p> <p>5 Q. Okay. For how long?</p> <p>6 A. Ten years.</p> <p>7 Q. Okay. And did Mr. Murray work with 8 you at Wissahickon as well?</p> <p>9 A. Yes.</p> <p>10 Q. What job did you have before you 11 went to work for the National Archives at 12 Wissahickon Avenue?</p> <p>13 A. I did four years of college.</p> <p>14 Q. Okay. And where did you go to 15 college?</p> <p>16 A. Penn State University.</p> <p>17 Q. Did you get a degree from there?</p> <p>18 A. No.</p> <p>19 Q. Okay. What years did you attend 20 there?</p> <p>21 A. '79, '80, '81 and '82.</p> <p>22 Q. Okay. I'm going to go right to the 23 events of the date that we're most focused on here 24 today. That's the last occasion that you say that</p>	<p>1 anybody regarding Mr. Murray?</p> <p>2 A. No.</p> <p>3 Q. Okay. What time did you leave for 4 your lunch break?</p> <p>5 A. Around 11:15.</p> <p>6 Q. Okay. Tell me where you walked 7 from, where you walked to, and then what happened?</p> <p>8 A. I walked out of the file to the 9 parking lot.</p> <p>10 Q. Okay. Why were you going to the 11 parking lot?</p> <p>12 A. I usually go outside and eat my 13 lunch.</p> <p>14 Q. Okay. And was there -- did you end 15 up seeing Mr. Murray?</p> <p>16 A. Well, when I went out in the parking 17 lot, he pulled up in the parking lot.</p> <p>18 Q. Where did he pull up?</p> <p>19 A. The front of the door.</p> <p>20 Q. How far was his car from the door. 21 He was in a car?</p> <p>22 A. Yeah. It was a couple of feet.</p> <p>23 Q. Okay. What color was his car?</p> <p>24 A. I'm not sure. I'm not sure.</p>

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IRENE JONES

	Page 14	Page 16
1	Q. What time was it?	1 A. Yes.
2	A. It was about 11:20.	2 Q. Did you tell Mr. Murray that you
3	Q. Okay. Was his car running at the	3 were going to do anything for him?
4	time?	4 A. I just told him that I would tell
5	A. Yes.	5 him that. You know, if I see Warren, I would tell
6	Q. What did you see when you arrived at	6 him that he wanted to speak to him.
7	his car?	7 Q. Did anybody else approach either of
8	A. It was just sitting there, sitting	8 you during the time you were there?
9	there in the car with a baby in the back seat.	9 A. In the parking lot?
10	Q. Was anybody else in the car?	10 Q. Uh-huh.
11	A. No.	11 A. The guard.
12	Q. Did you know at that time that he	12 Q. Okay. What was the guard's name?
13	was on administrative leave?	13 A. James. I'm not sure of his last
14	A. No, I didn't.	14 name. His first name is James.
15	Q. Okay. Had anybody told you before	15 Q. James Hughes, does that sound right?
16	you saw him that he had called the workplace that	16 A. Yes.
17	day?	17 Q. Okay. At what point did Officer --
18	A. No, they didn't.	18 Mr. Hughes come over to your car?
19	Q. Did you go to him to speak to him or	19 A. Well, after I had been standing
20	did he call out to you? How did you initiate any	20 there for like ten minutes, he came over to the
21	conversation --	21 car and told Mr. Murray that he didn't think that
22	A. I walked up to him.	22 he was allowed to be on the ground, that he would
23	Q. Okay. Was the window open?	23 ask Mr. McElroy, you know, was he allowed to be on
24	A. Yes.	24 the grounds. And Darryl just said, well, I'm
	Page 15	Page 17
1	Q. Okay. And what did you say?	1 sorry, excused himself and he left.
2	A. I asked him how he was doing. That	2 Q. Where were you standing at the time?
3	I didn't hear that he was suspended from the job.	3 A. At the car.
4	I asked him about the baby in the back seat. He	4 Q. Where --
5	said it belongs to a friend. He asked to speak to	5 A. On the passenger side.
6	one of my coworkers, which was one of his friends.	6 Q. Okay.
7	Actually, did I see him? Was he in that day? I	7 A. In the front.
8	told him yes. I told him that he wasn't in the	8 Q. And the front of the car was facing
9	area, he probably was back in the files. That	9 which direction, towards the entrance gate or the
10	when I see him, I would let him know.	10 other way?
11	Q. What was your tone of conversation?	11 A. The entrance to leave.
12	Were you laughing, joking, was it serious?	12 Q. Okay. So you were on the side of
13	A. It was laughing, joking, like we	13 the car facing the building?
14	always do.	14 A. Yes.
15	Q. Then what happened after that?	15 Q. Okay. And when Officer Hughes was
16	A. That was it. Just had a	16 speaking to Mr. Murray, where was he standing?
17	conversation with him. You know, and that was it.	17 A. Like a few feet over my shoulder.
18	Q. Did he tell you why he was	18 Q. Behind you?
19	interested in speaking to your coworker?	19 A. Yeah. Right, like on the right side
20	A. No. He just said that he wanted to	20 of me.
21	talk to him. You know, he had his phone number --	21 Q. Now, I have not yet seen the
22	he had lost his phone number, wondering, you know,	22 investigative report from Federal Protective
23	could you get his phone number again.	23 Services, which is part of the Department of
24	Q. Okay. And this is Mr. Hammond?	24 Homeland Security, but I spoke with a

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IRENE JONES

<p style="text-align: right;">Page 18</p> <p>1 representative of the agency yesterday. I'm going 2 to be getting the report soon. And he states that 3 in that report, the investigator for Federal 4 Protective Services states that you said to him 5 that you did not hear the substance of any of the 6 conversations between Officer Hughes and 7 Mr. Murray.</p> <p>8 A. Right.</p> <p>9 Q. Is it possible that you told an 10 investigator of that federal agency that you did 11 not hear the substance of the conversations 12 between Mr. -- Officer Hughes and Mr. Murray?</p> <p>13 A. I didn't -- I didn't hear the 14 conversation between them two. I don't know 15 whether he was out there before I got out there or 16 did he just walk out there, I don't know.</p> <p>17 Q. Okay.</p> <p>18 A. I just know when I walked out there 19 Darryl's car pulled up.</p> <p>20 Q. Okay.</p> <p>21 A. Now, I don't know had he been there 22 before I got out there or not, I don't know. I 23 don't know what conversation was between them two.</p> <p>24 Q. Okay. So there may have been</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay. Did you hear Mr. Murray say 2 anything to Officer Hughes?</p> <p>3 A. Nothing but "I'm leaving".</p> <p>4 Q. Okay. And you saw Mr. Murray leave?</p> <p>5 A. Yes.</p> <p>6 Q. How soon after Mr. Murray said what 7 you just said he said did he leave?</p> <p>8 A. Two minutes.</p> <p>9 Q. Did Officer Hughes go back in the 10 building?</p> <p>11 A. Yes. Because I walked away.</p> <p>12 Q. Where did you walk to?</p> <p>13 A. To the end of the grounds where I 14 usually eat my lunch at.</p> <p>15 Q. The picnic area?</p> <p>16 A. Yeah, close to there.</p> <p>17 Q. Okay. Where did -- when did Hughes 18 go back inside?</p> <p>19 A. After Darryl Murray pulled off.</p> <p>20 Q. Okay. Did he remain outside the 21 entire time after he came out?</p> <p>22 A. No. James, the guard?</p> <p>23 Q. James Hughes.</p> <p>24 A. No, no.</p>
<p style="text-align: right;">Page 19</p> <p>1 conversations, just so I'm clear, between Mr. 2 Murray and Security Officer Hughes, that you did 3 not hear?</p> <p>4 A. Not that I know of.</p> <p>5 Q. Right. You don't know. It's 6 possible that they had conversations?</p> <p>7 A. I couldn't say.</p> <p>8 Q. They could have spoken before you 9 got out there?</p> <p>10 A. They might have.</p> <p>11 Q. Okay. So what you told -- if in 12 fact, the report from Federal Protective Services 13 states that you said that you did not hear the 14 substance of any of the conversations between 15 Hughes and Mr. Murray, that's true?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Okay.</p> <p>18 A. Yes.</p> <p>19 Q. Apart from what you've already told 20 me that you heard Security Officer Hughes say to 21 Mr. Murray, did you hear Officer Hughes say 22 anything else to Mr. Murray?</p> <p>23 A. No. Other than I don't think you're 24 allowed on the grounds.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. What happened with Hughes? You said 2 he came out, he made the statement to Mr. Murray 3 then what did he do?</p> <p>4 A. After that he went back in, Darryl 5 pulled off.</p> <p>6 Q. Did he come back out after that?</p> <p>7 A. Not -- I didn't see him come back 8 out.</p> <p>9 Q. Okay. Did you have any 10 conversations with Mr. Hughes?</p> <p>11 A. No.</p> <p>12 Q. None at all?</p> <p>13 A. None.</p> <p>14 Q. Did you exchange any words at all 15 with him?</p> <p>16 A. None.</p> <p>17 Q. Did you say anything to Mr. Murray 18 before he left?</p> <p>19 A. Nothing but, "I'll see you later".</p> <p>20 Q. Okay. Did you have any 21 conversations with Mr. Murray, other than what 22 you've already told us about today?</p> <p>23 A. No, I didn't.</p> <p>24 Q. What was Mr. Murray's tone of voice</p>

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IRENE JONES

<p style="text-align: right;">Page 22</p> <p>1 throughout, apart from the sort of conversational 2 tone you already referred to? Did it ever become 3 angry or did you --</p> <p>4 A. Never angry. Normal, soft voice he 5 always had. No anger, no hollering, no screaming. 6 Didn't sound like he was mad or angry or anything.</p> <p>7 Q. Did you at any time before 8 Mr. Murray left leave the side of the car?</p> <p>9 A. Did I leave? No.</p> <p>10 Q. If Mr. Murray said or states that he 11 made certain statements to Officer Hughes that 12 you're not recalling, is it possible that he made 13 those statements to Officer Hughes?</p> <p>14 A. He didn't make any statements to 15 Officer Hughes while I was there.</p> <p>16 Q. So if he's stating that he did or if 17 he has stated in the past he did make certain 18 statements to Officer Hughes, you're not saying 19 that he didn't make them, that he's lying about 20 that or that you lied about that, you just didn't 21 hear them during the brief period that you were 22 there. Is what you are saying; is that correct?</p> <p>23 A. Officer Hughes -- when I always saw 24 Officer Hughes and Darryl Murray together, they</p>	<p style="text-align: right;">Page 24</p> <p>1 A. About 20 minutes. 2 Q. How long were you eating lunch after 3 the incident?</p> <p>4 A. For a half-an-hour. 5 Q. Did anybody talk to you about what 6 had happened --</p> <p>7 A. No. 8 Q. -- while you were eating? Excuse 9 me.</p> <p>10 Did you return to work after that?</p> <p>11 A. Yes.</p> <p>12 Q. Did anybody during the course of 13 your work that afternoon, later that morning, that 14 afternoon, talk to you about Mr. Murray coming to 15 the building?</p> <p>16 A. No.</p> <p>17 Q. Did you talk to anybody about 18 Mr. Murray coming to the building?</p> <p>19 A. No.</p> <p>20 Q. Did you talk to Mr. Hammond about 21 it?</p> <p>22 A. Did I talk to him about it? No, I 23 didn't see him during that period, no.</p> <p>24 Q. When did you next speak to</p>
<p style="text-align: right;">Page 23</p> <p>1 was always friends. He was always talking to him, 2 talking about his car. You know, what kind of car 3 he drove, what kind of car he had. They never had 4 no violent conversations, they was friends.</p> <p>5 Q. But what I'm saying is: If 6 Mr. Murray has stated that he has made certain 7 statements to Security Officer Hughes on that 8 occasion.</p> <p>9 A. How would I know that?</p> <p>10 Q. You don't have a basis for knowing 11 whether he did or not?</p> <p>12 A. No.</p> <p>13 Q. Okay.</p> <p>14 A. I wouldn't know that.</p> <p>15 Q. So you're not saying Mr. Murray 16 would be lying, then, you just didn't hear that, 17 correct?</p> <p>18 A. I was -- how would I have any idea 19 of that, if they had any violent conversations 20 with each other?</p> <p>21 Q. Okay.</p> <p>22 A. No.</p> <p>23 Q. How long total were you by the side 24 of the car?</p>	<p style="text-align: right;">Page 25</p> <p>1 Mr. Hammond about Mr. Murray? 2 A. Probably, like the next day. 3 Q. And what did you speak about when 4 you spoke to Mr. Hammond?</p> <p>5 A. Just told him Darryl lost his phone 6 number and he wanted, you know, him to call him. 7 Q. Did you speak to James Hughes that 8 day after Mr. Murray left, at any time?</p> <p>9 A. No.</p> <p>10 Q. Did you speak to James Hughes later 11 that week about Mr. Murray?</p> <p>12 A. No.</p> <p>13 Q. Did anybody in management talk to 14 you about Mr. Murray, his coming to the property 15 that week?</p> <p>16 A. That he was coming to the property 17 that week?</p> <p>18 Q. That he had come to the property. 19 And what happened that day.</p> <p>20 A. Did anybody ask me what happened 21 that day?</p> <p>22 Q. Yes.</p> <p>23 A. Yes. John McElroy.</p> <p>24 Q. When did he ask you that? On the</p>

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IRENE JONES

1 same day? 2 A. On the same day. 3 Q. What time? Do you remember? 4 A. Must have been between, I guess 5 12:00 or 12:15. I was called in like right after 6 my lunch was over. 7 Q. Okay. 8 A. Called into his office. 9 Q. Did anybody, other than Mr. McElroy, 10 talk to you about Mr. Murray coming to the 11 workplace that day? 12 A. No. 13 Q. Okay. What did you talk about with 14 Mr. McElroy? 15 A. He asked me what was the 16 conversation between me and the guard. The guard 17 said that I had witnessed him threatening some -- 18 throwing out some threats. That I had witnessed 19 him saying that. I told him I didn't witness him 20 saying it. 21 Q. So you told him you didn't hear any 22 threats? 23 A. I didn't hear no threats. 24 Q. Okay. What did Mr. McElroy say to	Page 26	1 Q. Did she say anything more to you? 2 A. No. 3 Q. Did you talk to her any further 4 about that after that? 5 A. No. 6 Q. Did you have any conversations with 7 any investigators, any detectives, any police 8 officers about Mr. Murray coming to the workplace 9 that day, at any time? 10 A. One detective called me on the phone 11 and asked me -- I don't know who he was -- asked 12 me for my phone number, my home phone number. If 13 I wanted to change my statement, you know, I could 14 give him a call. 15 Q. Okay. Did he ask you questions? 16 A. He asked me a few questions. 17 Q. Okay. Do you remember if his name 18 was Pepe, P-e-p-e? 19 A. That -- yeah, that sound like him. 20 Q. Okay. 21 A. That sounds like the name. 22 Q. Do you remember when that 23 conversation happened? 24 A. It happened like the next day.	Page 28
1 you? 2 A. He told me I was lying because I 3 wasn't looking him in the eyes when I said it. 4 Q. Did he say anything else to you? 5 A. That I told him why he called me in 6 the office if he wasn't -- he didn't believe what 7 I had to say. And I got up and left. 8 Q. Did Mr. McElroy or anybody in 9 management talk to you about the incident after 10 that? 11 A. Nobody but my supervisor, Pat Davis. 12 Q. Okay. What's her full name? 13 A. Pat Mary Davis. 14 Q. When did she talk to you about it? 15 A. Maybe like 15 or 20 minutes after 16 that. 17 Q. What did she ask you? 18 A. Saying that Darryl got himself into 19 something and he probably couldn't get himself out 20 of. And he's probably in a whole lot of trouble. 21 Q. And what did you tell her? 22 A. I told her that was definitely up to 23 whatever happened with him in the -- in the center.	Page 27	1 Q. Okay. So the events were pretty 2 fresh in your mind still? 3 A. Yeah, pretty much. 4 Q. Okay. And were you honest with him 5 when you talked to him? 6 A. Yes. 7 Q. Okay. Did you make any notes at all 8 after -- wait -- it seemed to you maybe that there 9 was some concern among management about the events 10 of that day; is that correct? That they were -- 11 they were raising questions about what Mr. Murray 12 might have said that day? 13 A. Yeah. He told me that -- somebody 14 said that if I was covering up or something for 15 him, that I could lose my job, you know. I told 16 him, you know, I told him what I had -- what I had 17 to tell him. I asked him, was he threatening me? 18 Q. Did you then make any notes for your 19 own records about what had happened about what 20 Mr. Murray had said? 21 A. No. 22 Q. Okay. Have you ever made any notes 23 regarding Mr. Murray and the events of 24 September 22nd, 2004?	Page 29

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IRENE JONES

<p>Page 30</p> <p>1 A. No.</p> <p>2 Q. Okay. Do you believe that National</p> <p>3 Archives management ever treated you differently</p> <p>4 because of what you said to Mr. McElroy, Ms. Davis</p> <p>5 after the events of September 22nd, 2004?</p> <p>6 A. Rephrase that again.</p> <p>7 Q. Do you believe that National</p> <p>8 Archives management ever treated you differently,</p> <p>9 based upon what you told Mr. McElroy following the</p> <p>10 September 22nd, 2004 incident?</p> <p>11 A. Yeah, I got treated a lot</p> <p>12 differently.</p> <p>13 Q. Okay. Explain.</p> <p>14 A. Well, I had one incident where I was</p> <p>15 on light duty and I had a bad knee. And I was</p> <p>16 taking medication that would keep the swelling</p> <p>17 down but it would make me drowsy. And they</p> <p>18 happened to see me sleeping and nodding, which I</p> <p>19 got written up and suspended for three days after</p> <p>20 that. And then after that happened I came back.</p> <p>21 Then I still got treated wrong.</p> <p>22 Q. So are you saying you were not</p> <p>23 sleeping when --</p> <p>24 A. They said -- they said I was fully</p>	<p>Page 32</p> <p>1 incidents happened with me after Darryl Murray had</p> <p>2 left.</p> <p>3 Q. But the incidents you've been just</p> <p>4 referring to happened before then; is that</p> <p>5 correct?</p> <p>6 A. Right, and it ran right over.</p> <p>7 Q. I'm sorry?</p> <p>8 A. It ran across that.</p> <p>9 Q. Were you upset with management based</p> <p>10 upon the way they -- the way you feel they treated</p> <p>11 you related to the sleeping on the job incident?</p> <p>12 A. It could have been. I just know I</p> <p>13 wasn't treated fairly after I gave up my</p> <p>14 statement.</p> <p>15 Q. Okay. And that was again before</p> <p>16 Mr. Murray --</p> <p>17 A. Before he --</p> <p>18 Q. -- came to the workplace on</p> <p>19 September 22nd --</p> <p>20 A. Right.</p> <p>21 Q. -- 2004?</p> <p>22 Were you angry with management at</p> <p>23 that point?</p> <p>24 A. No. I just knew what I had to do.</p>
<p>Page 31</p> <p>1 sleeping, I was nodding. What they -- I told him</p> <p>2 they had the letter, they had the medication that</p> <p>3 I was taking and it say may cause drowsiness. And</p> <p>4 they sent me on the dock, on a hot dock deck with</p> <p>5 no heat, no fans, no air. And, of course, I was</p> <p>6 going to fall off to sleep.</p> <p>7 Q. Okay.</p> <p>8 A. Nod off. But when they walked right</p> <p>9 over to me, I woke right up.</p> <p>10 Q. Okay. So --</p> <p>11 A. And a couple incidents where I was</p> <p>12 suspended. I was treated bad after that.</p> <p>13 Q. So you were caught sleeping then?</p> <p>14 A. Yeah.</p> <p>15 Q. In July of 2004?</p> <p>16 A. Yeah.</p> <p>17 Q. Is that right?</p> <p>18 A. Yeah.</p> <p>19 Q. Now, the incident happened September</p> <p>20 of 2004 with Mr. Murray. This is before that?</p> <p>21 A. Right.</p> <p>22 Q. So how could management have been</p> <p>23 treating you differently --</p> <p>24 A. And after that. There was a lot of</p>	<p>Page 33</p> <p>1 It was time for me to go.</p> <p>2 Q. Okay. So you were already resigned</p> <p>3 that you were leaving --</p> <p>4 A. No. I was working on getting out of</p> <p>5 there.</p> <p>6 Q. Okay.</p> <p>7 A. Might have came down to me being</p> <p>8 fired like he was.</p> <p>9 Q. Do you have any knowledge of the</p> <p>10 incident to let -- that led to Mr. Murray being</p> <p>11 placed on administrative leave around September</p> <p>12 22nd -- I mean, excuse me -- September 16th, 2004</p> <p>13 that would be about a week before he came to the</p> <p>14 workplace, the time we just talked about?</p> <p>15 A. I know I heard some talk going</p> <p>16 around saying that he was displaying some</p> <p>17 religious beliefs. That they were offensive to</p> <p>18 some people and others, you know, they wasn't</p> <p>19 taking it very well. But that's about it.</p> <p>20 Q. Who did you hear that from?</p> <p>21 A. Just a couple of coworkers. But</p> <p>22 ever since we worked with Darryl, he always</p> <p>23 displayed stuff for religious beliefs. I didn't</p> <p>24 find them offensive.</p>

9 (Pages 30 to 33)

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<p style="text-align: right;">Page 34</p> <p>1 Q. Which coworkers?</p> <p>2 A. Everybody in the building that went</p> <p>3 passed his area and just saw the pictures and</p> <p>4 maybe the literature, everybody had that.</p> <p>5 Q. Can you name a single person who</p> <p>6 complained about it?</p> <p>7 A. I didn't hear nobody complaining</p> <p>8 that it was belligerent or they felt, you know,</p> <p>9 degraded by or anything. No, nobody, nothing like</p> <p>10 that.</p> <p>11 Q. But did you hear through the</p> <p>12 grapevine that somebody was concerned about it?</p> <p>13 A. No. No, nobody but management.</p> <p>14 Q. Okay. So you never heard that a</p> <p>15 coworker was upset by anything?</p> <p>16 A. No.</p> <p>17 Q. Why is it your view that there was</p> <p>18 concern about religious content to the postings</p> <p>19 rather than other content?</p> <p>20 A. Well, lot of supervisors we deal --</p> <p>21 that we worked with had stuff of their religion.</p> <p>22 Hanging up literature, pictures, you know. And</p> <p>23 nobody never barked about or squalled about it</p> <p>24 until Darryl started displaying his religious</p>	<p style="text-align: right;">Page 36</p> <p>1 coworkers or anybody else?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did you read Mr. Murray's</p> <p>4 postings when they were up?</p> <p>5 A. Some of them.</p> <p>6 Q. Okay. Sometimes you didn't read</p> <p>7 them?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you ever see a posting</p> <p>10 referring, on Mr. Murray's workstation, referring</p> <p>11 to two legged cockroaches?</p> <p>12 A. Two legged cockroaches?</p> <p>13 Q. Two legged cockroaches.</p> <p>14 A. No.</p> <p>15 Q. Did you ever see a posting that</p> <p>16 stated low self-esteem, inferiority complex,</p> <p>17 inflated ego, jealous and worthless losers,</p> <p>18 nothing-ass employees?</p> <p>19 A. No.</p> <p>20 Q. Do you have any view as to whether</p> <p>21 or not that was directed to a coworker or not?</p> <p>22 A. No, I don't think so.</p> <p>23 Q. Okay. If it was directed to a</p> <p>24 coworker, would you consider that disparaging to</p>
<p style="text-align: right;">Page 35</p> <p>1 beliefs.</p> <p>2 Q. How -- what was in his posting that</p> <p>3 was religious as opposed to other content? What</p> <p>4 did you see that was religious content?</p> <p>5 A. Just the stuff on how black people</p> <p>6 are. How things be happening with different</p> <p>7 races; black, white, Indian, Spanish, you know,</p> <p>8 just regular basic religious beliefs that people</p> <p>9 have.</p> <p>10 Q. But what about that is religious?</p> <p>11 A. What about his religion?</p> <p>12 Q. What about that kind of posting</p> <p>13 would be religious?</p> <p>14 A. I called it literature. I wouldn't</p> <p>15 say it had anything to do with religion. I just</p> <p>16 called it black literature.</p> <p>17 Q. Did you see any particular, that you</p> <p>18 can tell me about, religious content to any of his</p> <p>19 postings as opposed to talking about race and</p> <p>20 things, politics?</p> <p>21 A. No.</p> <p>22 Q. Okay. Did you ever observe any</p> <p>23 content of any of Mr. Murray's postings that you</p> <p>24 would consider disparaging to anybody else, any</p>	<p style="text-align: right;">Page 37</p> <p>1 the coworker?</p> <p>2 A. If it was, none of them came up to</p> <p>3 him and said anything about it.</p> <p>4 Q. Okay. But if there is -- if there</p> <p>5 was a posting that said worthless losers,</p> <p>6 nothing-ass employees that was directed to a</p> <p>7 coworker, would you consider that disparaging to</p> <p>8 coworkers?</p> <p>9 A. That depends on the person.</p> <p>10 Q. Okay. Do you recall any coworker</p> <p>11 ever having an issue with any posting of</p> <p>12 Mr. Murray's?</p> <p>13 A. No. Just, did you read the</p> <p>14 literature that was on Darryl Murray's cubby</p> <p>15 today? I was like no.</p> <p>16 Q. Do you recall any incidents</p> <p>17 Mr. Murray ever had with a coworker -- forgive me</p> <p>18 if I don't pronounce the name right -- Hongdiep?</p> <p>19 A. Did he have any --</p> <p>20 Q. Am I pronouncing his name right?</p> <p>21 A. Hongdiep.</p> <p>22 Q. Okay. H-o-n-g-d-i-e-p?</p> <p>23 A. Yeah, Hongdiep.</p> <p>24 Q. Hongdiep.</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. Uh-huh.      2 Q. Do you recall Mr. Murray ever having      3 any issues with that coworker?      4 A. He can't hear.      5 Q. Okay. Do you recall him having any      6 problems with that coworker or concerns?      7 A. No.      8 Q. Okay. Do you remember him having      9 any concerns or issues with any other coworkers?      10 A. No.      11 Q. Okay. You never had a conversation      12 with him where he complained about a coworker?      13 A. Everybody complained about      14 coworkers.      15 Q. Nothing out of the normal?      16 A. Nothing out of the normal.      17 Q. Do you remember -- do you ever --      18 did you ever refer to a group of employees at the      19 National Archives Federal Records Center as the      20 status quo clique?      21 A. Yes.      22 Q. Okay.      23 A. There's a lot of them in there.      24 Q. Is that a term that's generally</p>	<p style="text-align: right;">Page 40</p> <p>1 A. No.      2 Q. Okay.      3 A. I'm a loner.      4 Q. Okay. Did -- do you remember      5 Mr. Murray ever complaining about that clique?      6 A. Yeah.      7 Q. And what were his complaints?      8 A. That they were stopping him from      9 moving on. Stopping him from being promoted.      10 Holding him back to the position he was in.      11 Q. Okay. What -- did he give you any      12 specifics about what they were doing, in his view?      13 A. They were just saying that they      14 wasn't going to promote him. They don't why he's      15 still here. He might as well leave. He's never      16 going to move on, you know, just like a little,      17 like, nitpicking. Something that would make you      18 mad.      19 Q. And what was his reaction to that?      20 A. I'm going to be here as long as I      21 want to be here.      22 Q. Okay. Do you recall Mr. Murray ever      23 complaining to you that that clique or any other      24 coworker was ever responsible for making things</p>
<p style="text-align: right;">Page 39</p> <p>1 used?      2 A. Yes.      3 Q. Who are they and why are they called      4 status quo clique?      5 A. Because they said that they are      6 employees that are related, like aunts and uncles      7 and nephews and sisters and nieces. So you called      8 them there the clique because they always look out      9 for each other. They protect each other's back --      10 Q. Who is --      11 A. -- no matter what.      12 Q. -- in the clique?      13 A. What -- which clique? There's a      14 whole lot of them.      15 Q. Okay. Is there a clique with      16 Mitchell Buffone, Vernel Tate?      17 A. Not now. It was back then, but I      18 don't think now.      19 Q. Okay. And who was in that clique?      20 A. Reecee, Pat.      21 Q. Can you give the full names?      22 A. Pat Davis, Reecee Dawson,      23 Mitch Buffone, Tamika Gilliard, lot of them.      24 Q. Were you in that clique?</p>	<p style="text-align: right;">Page 41</p> <p>1 disappear from his workstation?      2 A. We all know they do -- people do      3 stuff like that.      4 Q. Did Mr. Murray ever complain to you      5 about that?      6 A. Not complain to me about it, no.      7 Q. Okay. Did you ever have the view      8 that, that clique or any other coworkers were      9 taking things from Mr. Murray's workstation?      10 A. Well, I know they're capable of      11 doing things like that, yes.      12 Q. But you don't have specific      13 knowledge of that happening?      14 A. No.      15 Q. Okay. Did Mr. Murray ever state to      16 you his belief or his experience, excuse me, did      17 Mr. Murray ever state to you his experience with      18 having his car scratched or with pasta being      19 placed on his car?      20 A. Yes.      21 Q. Okay. Did he tell you who he      22 thought was responsible for that?      23 A. No.      24 Q. Okay. What was his reaction to that</p>

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<p>1 happening?</p> <p>2 A. He knew who it was, he knew who did</p> <p>3 it.</p> <p>4 Q. But he didn't tell you who?</p> <p>5 A. No.</p> <p>6 Q. Did he ever state to you that he</p> <p>7 sought to take any kind of revenge for any actions</p> <p>8 that were taken against him in the workplace?</p> <p>9 A. No.</p> <p>10 Q. Okay. Why do you believe that</p> <p>11 Mr. Murray was terminated?</p> <p>12 A. Because he did just the amount of</p> <p>13 work he was supposed to do and they couldn't push</p> <p>14 him to do no more. And they tried to agitate him</p> <p>15 and nagging, the bothering, the -- do everything</p> <p>16 that they could and he just wouldn't let them get</p> <p>17 to him.</p> <p>18 Q. So you think it was based on his</p> <p>19 performance with they wanted him to perform --</p> <p>20 A. More --</p> <p>21 Q. -- differently?</p> <p>22 A. They wanted him to perform more but</p> <p>23 he did just what was required of him. He wasn't</p> <p>24 giving them no more. So I think in that, because</p>	<p>Page 42</p> <p>1 A. Not until after Darryl Murray left,</p> <p>2 after they got him terminated.</p> <p>3 Q. Okay. Explain to me whether you're</p> <p>4 saying that you believe there was a religious</p> <p>5 component to Mr. Murray being terminated.</p> <p>6 A. Well, the religious stuff didn't</p> <p>7 come down off of Mitch's Buffone area until they</p> <p>8 made him move his. But the whole time he</p> <p>9 displayed his, nobody complained about the mobster</p> <p>10 pictures Mitch displayed, or the religious</p> <p>11 pictures Reecee had in her cubby hole, you know,</p> <p>12 the paraphernal, whatever they had up, nobody</p> <p>13 never complained about them until they jumped on</p> <p>14 Darryl. Then after they got Darryl out of there,</p> <p>15 then everybody else's stuff came down.</p> <p>16 Q. What in the -- what in the postings</p> <p>17 of Mr. Murray's, that he was cited for in 2004 had</p> <p>18 religious content?</p> <p>19 A. Just the regular prayers, maybe the</p> <p>20 regular sayings between different ethnic beliefs.</p> <p>21 You know, like everybody's ethnic beliefs display</p> <p>22 different things.</p> <p>23 Q. So when you say religion, are you</p> <p>24 referring to racial issues?</p>
<p>Page 43</p> <p>1 of that, they held him back.</p> <p>2 Q. Okay.</p> <p>3 A. Because he gave his 50 percent or</p> <p>4 whatever he was supposed to do to meet quota and</p> <p>5 that was it. They wasn't getting no more, but</p> <p>6 they know he could do more and he wasn't giving</p> <p>7 them no more.</p> <p>8 Q. Do you think there was any religious</p> <p>9 component to his termination?</p> <p>10 A. Could have been.</p> <p>11 Q. You say "could have been," are you</p> <p>12 just speculating?</p> <p>13 A. Well -- well, it was a lot of people</p> <p>14 like Mitch Buffone displayed pictures that are</p> <p>15 mobsters. And they didn't do anything to him. So</p> <p>16 the minute he put up a picture, religious beliefs</p> <p>17 or his articles, then it was a big thing.</p> <p>18 Q. Mr. Buffone put up a picture of</p> <p>19 John Gotti?</p> <p>20 A. Yes.</p> <p>21 Q. Was he --</p> <p>22 A. Always had it up.</p> <p>23 Q. Was he required at some point to</p> <p>24 take it down?</p>	<p>Page 45</p> <p>1 A. I didn't find none of his things to</p> <p>2 be racial, no.</p> <p>3 Q. Okay. When you're saying it's</p> <p>4 religious, you're saying he had prayers up?</p> <p>5 A. Yes, they did too. Sayings.</p> <p>6 Q. You saw --</p> <p>7 A. Agendas.</p> <p>8 Q. You saw prayers?</p> <p>9 A. Sayings. I saw like a little --</p> <p>10 like a couple of prayers, sayings up in Reecee's</p> <p>11 cubby hole.</p> <p>12 Q. No, no. I'm asking you about</p> <p>13 Mr. Murray's workstation. Did you, in 2004, see</p> <p>14 prayers at Mr. Murray's workstation?</p> <p>15 A. I didn't see no prayers up there.</p> <p>16 Q. Okay. What specifically do you</p> <p>17 recall had religious content?</p> <p>18 A. Just African-American, Chinese,</p> <p>19 Puerto Rican pictures. Actually, it was</p> <p>20 literature.</p> <p>21 Q. Okay. So it wasn't so much</p> <p>22 religious as his beliefs generally, political,</p> <p>23 sociological?</p> <p>24 A. No, nothing like that.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. So what was religious about what you 2 saw posted in his workplace? 3 A. That he just talk about different 4 beliefs that people believed in. 5 Q. Okay. 6 A. And different religions. 7 Q. But you saw discussion in 2004 of 8 specific postings that talked -- 9 A. Not -- no specific ones. 10 Q. Okay. Do you believe that there was 11 any religious basis for the decision to terminate 12 him based upon the incident in the parking lot? 13 A. They been at Darryl's neck for 14 years. 15 Q. But what I'm asking you is: You 16 said you thought that they were unhappy with his 17 performance? 18 A. That too. 19 Q. Okay. 20 A. Because he wouldn't kneel down and 21 bow down to them. Because he wouldn't do what 22 they told him to do. A whole lot of things. 23 Q. And so I'm asking you: Is there 24 anything that you believe had anything to do with</p>	<p style="text-align: right;">Page 48</p> <p>1 Mr. Buffone having a picture of John Gotti up, do 2 you recall anybody in the workplace at the Federal 3 Records Center having anything with religious 4 content that they were allowed to keep up that was 5 offensive to others? 6 A. Yes. His picture of his mobster 7 lawyer or friend or whoever he was. 8 Q. Are you talking about Mr. Buffone? 9 A. Yes. People didn't think that was 10 fair, that he could display his pictures and 11 Darryl couldn't display whatever he wanted to put. 12 Q. Are you talking about Gotti, the 13 picture of John Gotti? 14 A. Yes. 15 Q. Any other pictures that Mr. Buffone 16 had? 17 A. No. 18 Q. Okay. Do you recall anybody else in 19 the workplace having anything else, apart from 20 that picture that Mr. Buffone had of Mr. Gotti, 21 that was religious in content and that a worker 22 was allowed to keep posted? 23 A. No. 24 Q. Okay. Did other coworkers have</p>
<p style="text-align: right;">Page 47</p> <p>1 his religion, that had anything to do with his 2 termination based upon the incident in the parking 3 lot? 4 A. It could have been a combination of 5 some of it all. 6 Q. Okay. You're guessing that it could 7 have been? 8 A. I think it was. 9 Q. Okay. You think it was based on 10 what? 11 A. On his religious beliefs, what he 12 believed in. 13 Q. Okay. 14 A. His work performance. All of the 15 above. 16 Q. Okay. Did you ever hear any 17 conversation among management, by anybody in 18 management related to Mr. Murray's religion? 19 A. Rephrase that. 20 Q. Did anybody in management ever talk 21 to you about any belief or concern or view they 22 had regarding Mr. Murray's religion? 23 A. No. 24 Q. Apart from the reference you made to</p>	<p style="text-align: right;">Page 49</p> <p>1 prayers, bibles, things like that at their 2 workstations? 3 A. Yeah. 4 Q. Okay. And they were allowed to keep 5 those sorts of things, right? 6 A. Uh-huh. 7 Q. Okay. But, again, you're not -- 8 you're saying there wasn't anything that was 9 religious in content that was viewed as offensive 10 that anybody was allowed to keep. It was just 11 those things like prayers and bibles? 12 A. Yeah. 13 Q. Okay. Do you recall anybody having 14 any political postings in their workstations? 15 A. No. 16 Q. Do you recall any coworkers ever, 17 during your time either at Wissahickon or Townsend 18 Road, ever making any threats towards management 19 towards coworkers, towards the workplace that were 20 not addressed by management? 21 A. No. 22 Q. Do you recall anybody ever making 23 any threats? 24 A. Uh-huh.</p>

13 (Pages 46 to 49)

IRENE JONES

<p style="text-align: right;">Page 50</p> <p>1 Q. Did Mr. Murray ever complain to you 2 about physical or mental health issues? 3 A. Yeah, a few. 4 Q. Can you tell us what he complained 5 about? 6 A. Like he said something about he had 7 problems with his back. 8 Q. Okay. When did he start complaining 9 about those? 10 A. Well, that's as far as I've been 11 working there. I remember him saying that, that 12 something happened with him with his back. 13 Q. Okay. Any other complaints, 14 physical or mental? 15 A. No. 16 Q. Excuse me. Have you ever socialized 17 with Mr. Murray outside of work with friends or 18 anybody? 19 A. I might have seen him outside of 20 work; but as far as going out with him and hanging 21 out with him, no. 22 Q. And you haven't socialized with him 23 since he left -- 24 A. Right.</p>	<p style="text-align: right;">Page 52</p> <p>1 that, like, they had a lot of people that their 2 own cliques that wasn't going to let me get there. 3 So it was time for me to make my move. 4 Q. Any other reason why you left? 5 A. That's it. 6 Q. Have you ever been charged 7 criminally with anything? 8 A. No. 9 Q. Have you ever been party to a civil 10 lawsuit? 11 A. Nope. 12 Q. Never been a plaintiff or defendant 13 in a lawsuit? 14 A. No. 15 Q. Okay. You mentioned that you were a 16 deponent, you were deposed in a family matter? 17 A. Uh-huh. 18 Q. Have you ever been a witness in any 19 other kind of matter? 20 A. No. 21 Q. And, again, I'm showing you what's 22 been marked as Exhibit A in this deposition, your 23 affidavit. 24 A. Uh-huh.</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. -- employment with -- 2 A. Haven't seen him. I was wondering 3 if he's all right. 4 Q. What's your religion, if any? 5 A. Baptist. 6 Q. Okay. Do you belong to 7 Elizabeth Washington's church? 8 A. No. 9 Q. Oh, you don't. 10 A. Uh-huh. 11 Q. Why did you leave the National 12 Archives Records Administration? 13 A. Well, they basically, they told us a 14 couple years ago that the place is not going to be 15 staying there long; and it's best if we all try to 16 find another job, generally speaking. And I went 17 as far as I could in there. Was no way I could be 18 a supervisor in there because I had a few people 19 ahead of me. And they had to wait for them to 20 retire or die. And that wasn't going to happen. 21 They've been there like 20 or 30-something years. 22 I had like three or four people in front of me to 23 become a supervisor. And I know I wasn't going to 24 become a supervisor in there. On the strength</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. If you could, just confirm that 2 that's your signature -- 3 A. Yes, it is. 4 Q. -- on the last page. 5 A. Uh-huh. 6 Q. Okay. And this was true and correct 7 when you signed it? 8 A. Uh-huh. 9 Q. And for the record, if you could 10 just state your race? 11 A. African-American. 12 Q. Okay. I'm just going to step 13 outside with Mr. Davenport for a second and then 14 we will proceed. If you cannot just talk to each 15 other. 16 (Recess at 10:40 a.m.) 17 (Resumed at 10:41 a.m.) 18 BY MR. SULLIVAN: 19 Q. Ms. Jones, just one final set of 20 questions. Did you do anything to prepare for 21 today's deposition? Did you talk to anybody or 22 read anything? A. No. Q. Okay. Nothing at all?</p>

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<p>1        A. No.      2        Q. Okay.      3            MR. SULLIVAN: No further questions.      4            Mr. Murray, I turn it over to you.      5            MR. MURRAY: No questions.      6            MR. SULLIVAN: Okay. Thanks very      7        much.      8            (10:41 a.m.)      9      10      11      12      13      14      15      16      17      18      19      20      21      22      23      24</p>	<p>Page 54</p>
<p>1        I, Tracey L. Pinsky, Registered      2        Professional Reporter, certify that the foregoing      3        is a true and accurate transcript of the      4        deposition of IRENE JONES, who was first sworn by      5        me at the time, place and on the date herein      6        before set forth.      7            I further certify that I am neither      8        attorney nor counsel for, not related to or      9        employed by, any of the parties to the action in      10      which this deposition was taken; further, that I      11      am not a relative or employee of any attorney or      12      counsel employed in this case, nor am I      13      financially interested in this action.      14      15      16      17      18      19      20      21      22        Registered Professional Reporter      23      24</p>	<p>Page 55</p>

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